

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2016-256-C**

In the Matter of the Application of)	
)	
CALLCATCHERS INC. D/B/A FREEDOMVOICE)	DIRECT TESTIMONY OF
SYSTEMS)	ERIC THOMAS
)	
For A Certificate Of Public Convenience And)	
Necessity To Provide Resold Interexchange)	
Telecommunications Services in the State of South)	
Carolina and for Alternative Regulation of its)	
Interexchange Offerings)	

1 **Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.**

2 A. My name is Eric Thomas. I am President of CallCatchers Inc. d/b/a FreedomVoice
3 Systems (“FreedomVoice”).

4 **Q. PLEASE BRIEFLY DESCRIBE YOUR BACKGROUND, INCLUDING**
5 **EDUCATIONAL AND BUSINESS EXPERIENCES.**

6 A. I bring over twenty years of leadership in the development of virtual and hosted business
7 phone solutions. As a pioneer of toll free virtual phone systems in 1996, I made my
8 move towards the hosted VoIP phone system market in 2006 with the goal of providing a
9 better set of telecommunications tools that small businesses could use to enhance their
10 image and maximize productivity. Not content to buy or borrow someone else’s
11 technology, I led FreedomVoice in the creation of FreedomIQ, an industry-leading hosted
12 VoIP PBX platform engineered from the ground up.

1 I keep FreedomVoice a profitable, debt-free, and rapidly-growing company by attracting
2 customers with a friendly, down-to-earth staff, a uniquely cost-effective billing model,
3 and a commitment to outstanding quality of service.

4 Prior to FreedomVoice, I held the position of President at B/T SciTech, a molecular
5 biology distribution firm I founded in 1991.

6 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

7 A. No, I have not.

8 **Q. ARE YOU FAMILIAR WITH THE APPLICATION FILED BY**
9 **FREEDOMVOICE?**

10 A. Yes. I assisted in the preparation of the Application.

11 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

12 A. The purpose of my testimony is to describe the technical, managerial and financial fitness
13 of FreedomVoice to provide resold interexchange telecommunications services within the
14 State of South Carolina. This testimony will also describe the service to be provided by
15 FreedomVoice. Finally, my testimony will show that the public interest will be served by
16 the approval of FreedomVoice's Application.

17 **Q. ARE ALL OF THE STATEMENTS IN FREEDOMVOICE'S APPLICATION**
18 **CORRECT AND TRUE TO THE BEST OF YOUR KNOWLEDGE,**
19 **INFORMATION AND BELIEF?**

20 A. Yes.

1 **Q. DO YOU WISH TO INCORPORATE BY REFERENCE ANY DOCUMENTS**
2 **INTO THIS TESTIMONY?**

3 A. Yes. I wish to incorporate, by reference, FreedomVoice's underlying Application filed in
4 this proceeding and its associated exhibits.

5 **Q. DO YOU RATIFY AND CONFIRM THE STATEMENTS AND**
6 **REPRESENTATIONS MADE IN THAT APPLICATION AND ALL EXHIBITS**
7 **THERE TO?**

8 A. Yes.

9 **Q. HAS APPLICANT REGISTERED TO DO BUSINESS IN SOUTH CAROLINA?**

10 A. Yes. FreedomVoice received foreign corporation authority in South Carolina on
11 November 24, 2010. A copy was attached as Exhibit A to the Application.

12 **Q. HAS ANYTHING OCCURRED SINCE FREEDOMVOICE FILED ITS**
13 **APPLICATION THAT MATERIALLY CHANGES THE REPRESENTATIONS**
14 **THEREIN?**

15 A. No. The representations made in the Application remain materially the same.

16 **Q. DESCRIBE THE AUTHORITY THAT FREEDOMVOICE SEEKS BY ITS**
17 **APPLICATION.**

18 A. FreedomVoice seeks authority to provide all forms of interexchange telecommunications
19 services on a resale basis via the facilities of its underlying carriers.

1 **Q. DOES FREEDOMVOICE PROPOSE TO OFFER TELECOMMUNICATIONS**
2 **SERVICES TO BOTH RESIDENTIAL AND BUSINESS/COMMERCIAL**
3 **CUSTOMERS?**

4 A. FreedomVoice markets its services primarily to business customers. The flexibility,
5 scalability and functionality of FreedomVoice's services provide the greatest advantages
6 for business users. However, FreedomVoice will serve residential customers if required
7 to do so by the Commission.

8 **Q. DO THE PRINCIPALS AND EMPLOYEES OF FREEDOMVOICE HAVE**
9 **PREVIOUS TELECOMMUNICATIONS EXPERIENCE?**

10 A. Yes. As described in Exhibit C of the Application, the officers and senior management
11 of FreedomVoice have considerable previous telecommunications experience.

12 **Q. PLEASE DESCRIBE FREEDOMVOICE'S FINANCIAL QUALIFICATIONS TO**
13 **PROVIDE TELECOMMUNICATIONS SERVICES IN SOUTH CAROLINA.**

14 A. As set forth in the Application, FreedomVoice possesses the financial resources
15 necessary to provide reliable telecommunications services. FreedomVoice's most recent
16 financial statements have been filed with the Commission. As referenced in the
17 Application, FreedomVoice is in the process of being acquired by GoDaddy Operating
18 Company, LLC ("GoDaddy Operating"). The most recent financial statements for
19 GoDaddy Operating's parent, GoDaddy Inc., are available in GoDaddy Inc.'s most recent
20 Form 10-K filed with the Securities and Exchange Commission on March 2, 2016:
21 *(available at:*

1 <http://www.sec.gov/Archives/edgar/data/1609711/000160971116000048/gddy->
2 [12312015x10k.htm](http://www.sec.gov/Archives/edgar/data/1609711/000160971116000048/gddy-12312015x10k.htm)).

3 **Q. DOES FREEDOMVOICE INTEND TO OFFER PREPAID DEBIT CARD**
4 **SERVICES IN SOUTH CAROLINA?**

5 A. Not at this time. FreedomVoice is aware of the Commission's \$5,000 bond or certificate
6 of deposit requirement associated with prepaid debit card services, and will file such an
7 instrument with the Commission should FreedomVoice decide to offer these services in
8 the future.

9 **Q. HOW DOES FREEDOMVOICE BILL FOR ITS SERVICES?**

10 A. FreedomVoice bills any applicable initiation fees and monthly recurring charges in
11 advance of the month of usage. FreedomVoice invoices customers on a monthly basis
12 for recurring monthly charges for the specific plan purchased by the customer and
13 minutes used above the plan allowance for the previous month. Usage charges are billed
14 in arrears for the previous month. At the time the customer signs up for service via
15 FreedomVoice's website, the company obtains credit or debit card information from the
16 customer, and automatically bills the customer's credit or debit card each month for the
17 invoiced charges. If a customer elects to pay by check rather than by credit or debit card,
18 FreedomVoice may require a deposit equal to the monthly recurring charge.

19 **Q. HOW ARE TROUBLE REPORTS AND CUSTOMER COMPLAINTS**
20 **HANDLED?**

21 A. Customer complaints will be handled entirely in-house by FreedomVoice's customer
22 service staff. Customers may reach FreedomVoice toll free by calling (800) 477-1477, or

1 by opening a support ticket at support@FreedomVOICE.com. Customers may access
2 FreedomVoice's customer service to initiate service complaints or to receive updates on
3 reported problems or pending customer service complaints twenty-four hours a day,
4 seven days a week. Customers may also call this number to leave a message. Inquiries
5 regarding service or billing may also be made in writing.

6 **Q. DOES FREEDOMVOICE HAVE OFFICES IN SOUTH CAROLINA?**

7 A. No, FreedomVoice does not intend to have offices in South Carolina at this time.
8 Accordingly, FreedomVoice requests, pursuant to Rule 103-610, that the Commission
9 allow it to keep all applicable books and records at its offices in California. In the event
10 that the Commission or ORS should desire to inspect such books and records,
11 FreedomVoice will provide access expeditiously at its own expense.

12 **Q. HOW WILL FREEDOMVOICE MARKET ITS SERVICES?**

13 A. FreedomVoice will market its services through its website and a direct sales team.
14 FreedomVoice will not engage in any telemarketing activities.

15 **Q. HAS FREEDOMVOICE OBTAINED AUTHORITY TO PROVIDE ITS**
16 **SERVICES IN ANY OTHER STATES?**

17 A. Yes. FreedomVoice is also authorized to provide interexchange telecommunications
18 services pursuant to registration, commission order or on a deregulated basis in the states
19 of: California, Connecticut, Florida, Illinois, Maine, Maryland, Michigan, New Jersey,
20 New York, Pennsylvania, Rhode Island, Tennessee, Utah, Virginia, Washington, and
21 Wisconsin. Furthermore, FreedomVoice is currently registered to provide Interconnected

1 Voice over Internet Protocol (“I-VoIP”) services in the following states: California,
2 Illinois, Michigan, Nebraska, and Wisconsin.

3 FreedomVoice is currently in the process of applying for authorization or registering to
4 provide interexchange and I-VoIP services in the remaining fifty states, the District of
5 Columbia, and Puerto Rico – to the extent required by the laws and regulations of the
6 specific jurisdiction.

7 **Q. PLEASE DESCRIBE THE PROPOSED TARIFF FILED BY FREEDOMVOICE.**

8 A. FreedomVoice filed as **Exhibit D** to the Application its proposed resold interexchange
9 telecommunications service tariff. That tariff contains the applicable rules and
10 regulations for the provision of such services. I believe that FreedomVoice’s tariffs will
11 comport with all applicable Commission Rules and Orders, and FreedomVoice agrees to
12 make all changes suggested by the ORS that may be necessary to comply with applicable
13 authority.

14 **Q. HAS FREEDOMVOICE SOUGHT ALTERNATIVE REGULATION IN THIS**
15 **DOCKET?**

16 A. Yes. FreedomVoice requests that all of its business service offerings be regulated
17 pursuant to the procedures described and set out in Order Nos. 95-1734 and 96-55 in
18 Docket No. 95-661-C, and as modified by Order No. 2001-997 in Docket No. 2000-407-
19 C. It is Applicant’s intent by this request to have its business services regulated in the
20 same manner as this Commission has permitted for AT&T Communications of the
21 Southern States. Specifically, Applicant requests: a) removal of maximum rate tariff
22 requirements for its business services, consumer card, operator service (Excepting those
23 operator-assisted calls where a consumer uses a local exchange carrier’s calling card to

1 complete calls from locations which have not selected the local exchange carrier as their
2 toll provider. Operator surcharges and per-minute rates for this type of call were capped
3 by Order No. 2001-997 dated November 8, 2001) and future private line, and customer
4 network-type offerings; b) that tariff filings for these uncapped offerings are presumed
5 valid upon filing. If the Commission institutes an investigation of a particular filing
6 within seven days, the tariff filing will be suspended until further order of the
7 Commission; and c) any relaxation in the reporting requirements that may be adopted for
8 AT&T shall apply to the Applicant also.

9 **Q. WILL GRANTING FREEDOMVOICE A CERTIFICATE SERVE THE PUBLIC**
10 **INTEREST OF SOUTH CAROLINA CONSUMERS?**

11 A. Yes. A decision by the Commission to grant FreedomVoice authority to provide
12 interexchange telecommunications service is in the best interest. The public interest will
13 be served by expanding the availability of competitive telecommunications services and
14 enhanced telecommunications infrastructure in the State of South Carolina, thereby
15 facilitating economic development. Authorizing FreedomVoice to enter the
16 telecommunications services market will increase the competitive choices available, and
17 in turn create incentives for all carriers to lower prices, provide new and better quality
18 services, and be more responsive to customer issues and demands.

19 **Q. WHO IS KNOWLEDGEABLE ABOUT FREEDOMVOICE'S OPERATIONS**
20 **AND WILL SERVE AS THE COMMISSION'S/ORS' REGULATORY AND**
21 **CUSTOMER SERVICE CONTACT?**

22 A. All questions regarding ongoing compliance matters should be directed to:

1 Gino Capozzi, Tax and Regulatory Compliance Manager
2 169 Saxony Road, Suite 214
3 Encinitas, CA 92024
4 Tel: (800) 477-1477 x 816
5 Fax: (800) 477-1477
6 Email: Compliance@freedomvoice.com
7

8 All questions regarding customer service issues should be directed to:
9

10 Cedar Coleman, Director of Customer Care
11 169 Saxony Road, Suite 206
12 Encinitas, CA 92024
13 Tel: (800) 477-1477 x 807
14 Fax: (800) 477-1477
15 Email: cedar.coleman@freedomvoice.com
16
17

18 **Q. WILL FREEDOMVOICE COMPLY WITH ALL OF THE APPLICABLE RULES,**
19 **REGULATIONS, AND ORDERS OF THE COMMISSION?**

20 A. Yes.

21 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

22 A. Yes.

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South Carolina And for Alternative)
Regulation of its Interexchange Offerings)

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day the **Direct Testimony of Eric Thomas** via electronic mail service as follows:

C. Lessie Hammonds
lhammon@regstaff.sc.gov

Andrew Bateman
abateman@regstaff.sc.gov

s/John J. Pringle, Jr.

August 8, 2016
Columbia, South Carolina